

REMARKS

This is intended as a full and complete response to the Final Office Action dated March 31, 2005, having a shortened statutory period for response set to expire on June 30, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claim Rejections - 35 U.S.C. § 102

Claims 39-49 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Gano et al.* (U.S. Patent No. 6,568,472). In response, Applicants respectfully traverse the rejection.

Applicants amended claim 39 to include the limitation previously presented in its dependent claim 49. For this reason, the amendment to claim 39 does not raise new issues. The Examiner did not address claim 49 in the Office Action other than to state that the claim is pending. A sand screen disclosed in *Gano et al.* does not have a solid wall due to perforations that permit fluid communication between an interior thereof and a surrounding wellbore. Thus, *Gano et al.* fails to teach, show or suggest a system for expanding a tubular that includes an expander having an outer diameter portion larger than an inner diameter of the tubular to be expanded, wherein the tubular has a solid wall and a substantially continuous circumference, a seal to create a fluid seal within an unexpanded portion of the tubular ahead of the expander, and a lubricant supplied to the inner diameter of the tubular and in fluid communication with at least a section of the outer diameter portion of the expander, as recited in claim 39. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claim 39 and claims 40-43 dependent thereon.

Regarding claim 44, *Gano et al.* discloses flowing a washing fluid through a sand screen to a surrounding annular area. Some of the washing fluid supplied to the inside surface of the sand screen passes through the sand screen to the annular area prior to the flow of washing fluid even reaching a swedge. Even as any remaining washing fluid flows through grooves on the swedge, more of the remaining washing fluid is passing to the annular area to fulfill the object disclosed in *Gano et al.* of washing the screen.

PATENT
Atty. Dkt. No. MRKS/0057.C1

Consequently, only a portion (*i.e.*, not substantially all) of the washing fluid actually flows along a length of the swedge within the grooves as taught in *Gano et al.* Therefore, *Gano et al.* fails to teach, show or suggest supplying a lubricant to an inside surface of a tubular such that substantially all of the lubricant is forced between an expander and the inside surface of the tubular along a length of the expander in contact with the tubular, as recited in claim 44 and claims 45-48 dependent thereon. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Allowable Subject Matter

Claims 18-38 are allowed. Applicant acknowledges allowance of these claims.

Conclusion

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



William B. Patterson
Registration No. 34,102
MOSER, PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicants